

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS and LAWYERS FOR
CIVIL RIGHTS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, IMMIGRATION
AND CUSTOMS ENFORCEMENT,

Defendants.

C.A. No. 19-12564-MBB

PLAINTIFFS' STATUS REPORT

As discussed in further detail below, Defendants report that they have nearly completed their production of documents responsive to the WSO Request. Accordingly, Plaintiffs respectfully request that the Court enter the proposed briefing schedule below for the WSO Request. For the Gang Profiling Request, Plaintiffs ask that the Court set a deadline in mid-November for the parties to submit a production schedule.

I. WSO Request – Proposed Summary Judgment Schedule

For the **WSO Request**, Defendants report that they have completed their production, with the exception of 15 pages still under review by ICE and DHS. Consistent with the Court's bifurcated approach to this case, Plaintiffs propose that the Court hear Defendants' motion for summary judgment on the WSO Request only by early 2021, as per the following schedule:

Event	Deadline
Deadline for Defendants to complete production, file for summary judgment, and produce <i>Vaughn</i> index	November 30, 2020 ¹
Deadline for Plaintiffs to file their opposition	December 21, 2020
Deadline for Defendants to file reply in support of their motion for summary judgment	January 18, 2021
Hearing on Defendants' motion for summary judgment	<i>Early 2021</i>

II. Gang Profiling Request

For the **Gang Profiling Request**, due to circumstances outside the parties' control, Defendants have not been able to meet and confer with Plaintiffs regarding a production schedule. Plaintiffs request that the Court set a deadline in mid-November for the parties to submit scheduling proposals for the production of documents responsive to the Gang Profiling Request.

¹ November 30 is two months after the Court's September 30 deadline for Defendants to complete production of documents responsive to the WSO Request.

Date: October 13, 2020

Respectfully Submitted,

/s/ Lauren Godles Milgroom
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing will be filed through the electronic filing system of the Court, which system will serve counsel of record, on October 13, 2020.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom